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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 **ROBERT JOHNSON JR.,**

10 Plaintiff,

11 v.

12 EXPERIAN INFORMATION SOLUTIONS,
13 INC; BACKGROUNDCHECKS.COM LLC;
14 CLARITY SERVICES, INC. and NISSAN-
INFINITY LT LLC,,

15 Defendants.

Case No.: 2:25-cv-01127

**UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE
RESPONSE TO COMPLAINT
(FIRST REQUEST)**

17 Pursuant to Fed. R. Civ. P. 6(b) and L.R. 7.1(b), Defendant Nissan Motor Acceptance
18 Company LLC, incorrectly plead as Nissan Infinity LT LLC (“NMAC”), by counsel, respectfully
19 request a twenty-eight (28) day enlargement of the time to respond to the Complaint of Plaintiff
20 Robert Johnson Jr. in this action (“Plaintiff”). In support thereof, NMAC states:

21
22 1. On June 24, 2025, Plaintiff filed his Complaint in the Unites States District Court
23 for the District of Nevada.

24 2. On or around June 26, 2025, NMAC was served with the Complaint.

25 3. NMAC’s deadline to respond to the Complaint is July 17, 2025, and as such has
26 not yet passed.
27
28

1 4. NMAC respectfully requests a twenty-eight (28) day extension of time, through
2 and including August 14, 2025, to respond to Plaintiff's Complaint.

3 5. Good cause exists for the requested extension. NMAC's counsel has been recently
4 retained and requires additional time to complete its investigation of the allegations in the
5 Complaint and prepare its responsive pleading. In addition, the requested extension will allow
6 additional time for counsel for Plaintiff and counsel for NMAC to confer over the merits of the
7 claims.
8

9 6. This is the first motion to extend this deadline to respond to the Complaint sought
10 by NMAC in this matter.

11 7. This motion is made in good faith and not for purposes of undue delay. No party
12 will be prejudiced by the relief sought.
13

14 8. Counsel for Defendant conferred with Plaintiff regarding the extension of time
15 requested herein, who confirmed that Plaintiff does not oppose the relief sought herein.
16

17 WHEREFORE, Defendant NMAC respectfully requests that the Court grant this
18 Unopposed Motion and extend the time for NMAC to respond to the Complaint by and through
19 August 14, 2025.

20 Dated: July 16, 2025

21
22
23
24
25 IT IS SO ORDERED.

26 
27 _____
28 U.S. MAGISTRATE JUDGE

 Date: July 16, 2025

 WRIGHT, FINLAY & ZAK, LLP

/s/ Jory C. Garabedian

 Jory C. Garabedian, Esq.

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 Company